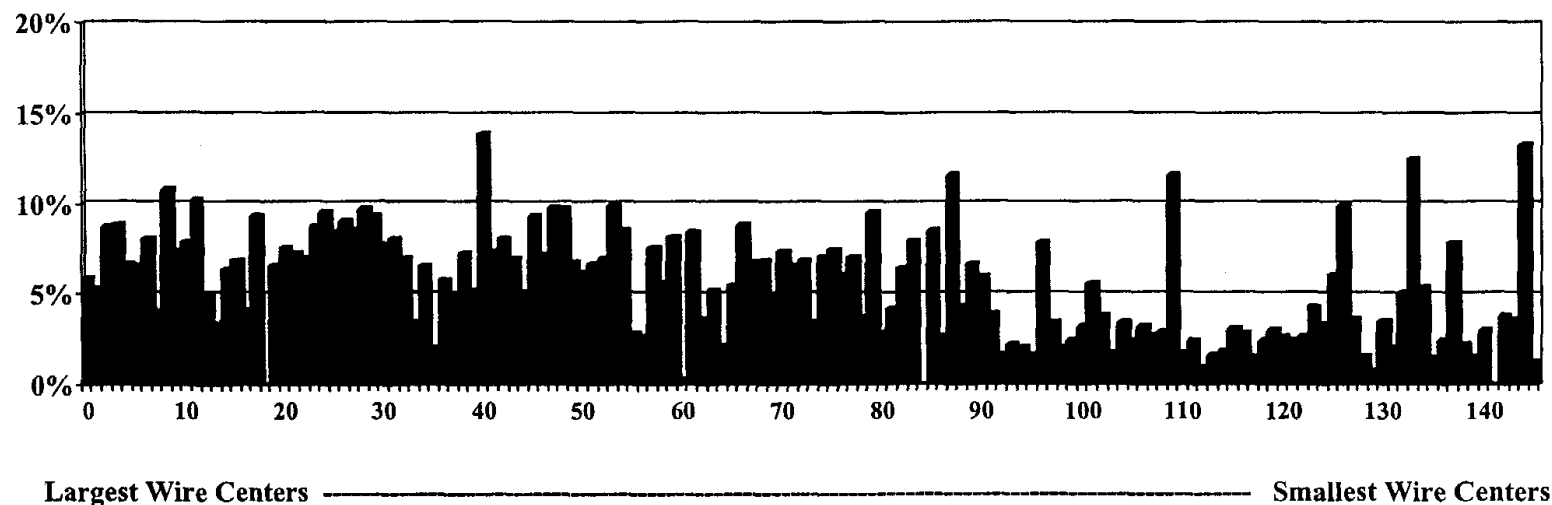


Comments of the PACE Coalition, et al.
October 4, 2004

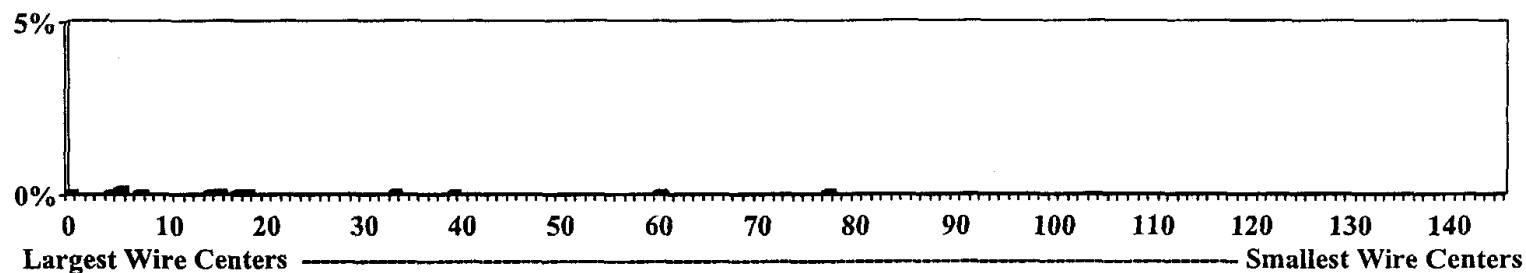
EXHIBIT 21

Page 1 of 22
Filed in AL Docket No. 29054 as Exhibit JPG-5
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P Past 6 Months – BellSouth in Alabama
Lines Added April 2003 through September 2003

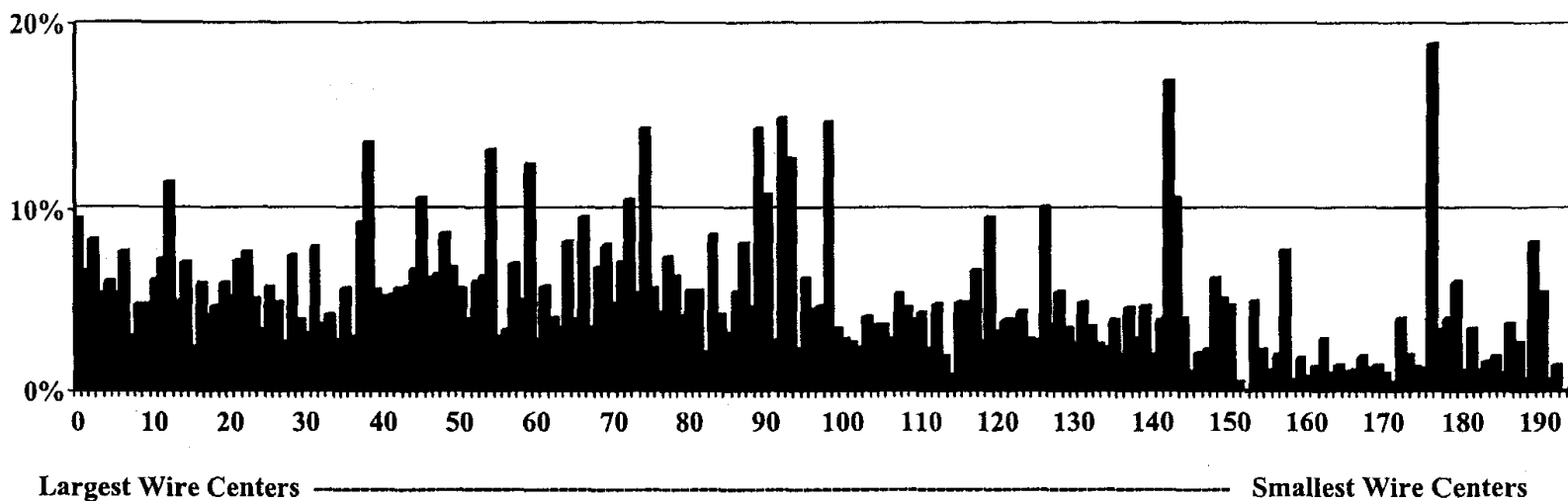


Competitive Profile of UNE-L Past 6 Months – BellSouth in Alabama

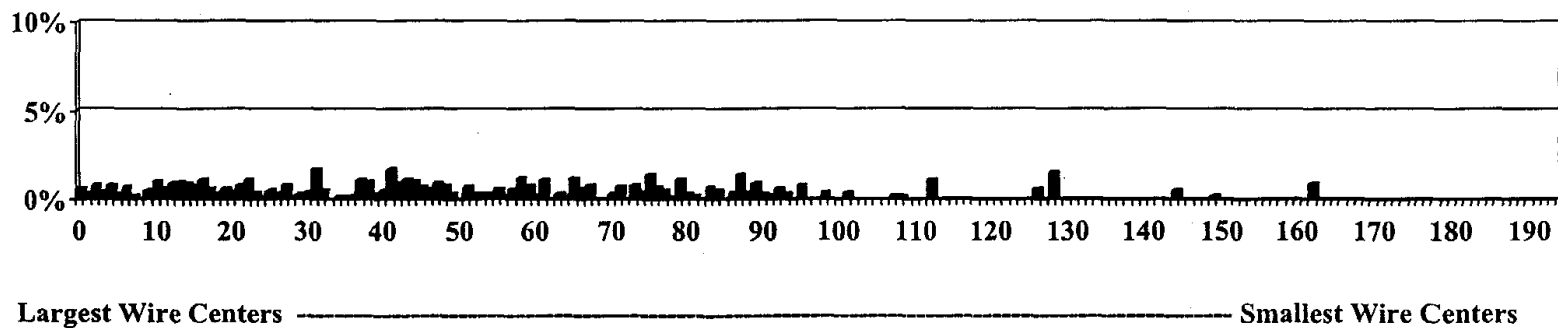


Page 2 of 22
Filed in Florida Docket No. 030851-TL as Exhibit JPG-C
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P – BellSouth Territory in Florida – Last 6 Months

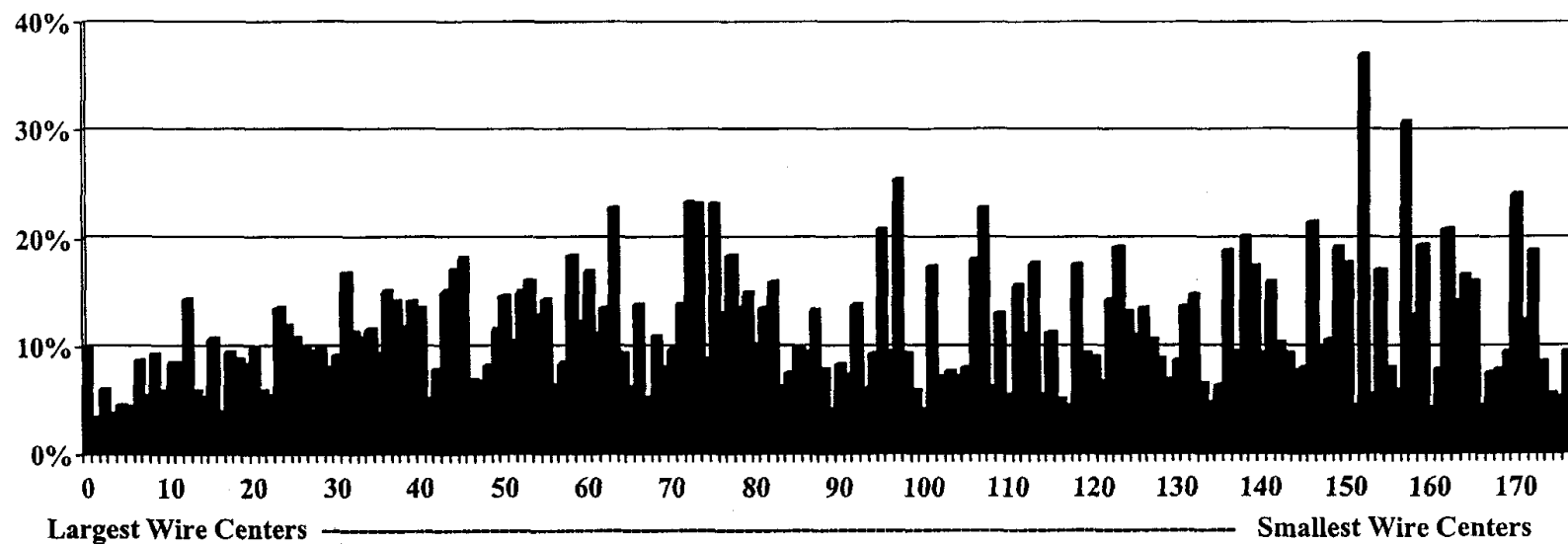


Competitive Profile of UNE-L – BellSouth Territory in Florida – Last 6 Months

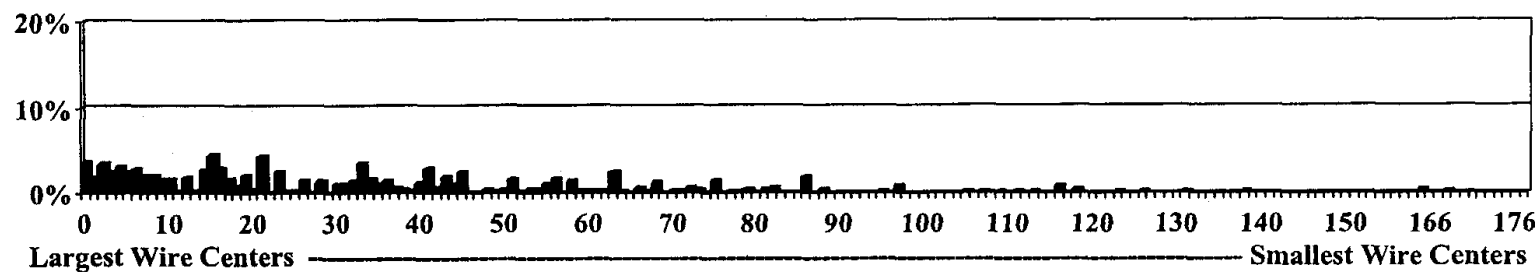


Page 3 of 22
Filed in Georgia Docket No. 17749-U as Exhibit JPG-3
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P – BellSouth in Georgia

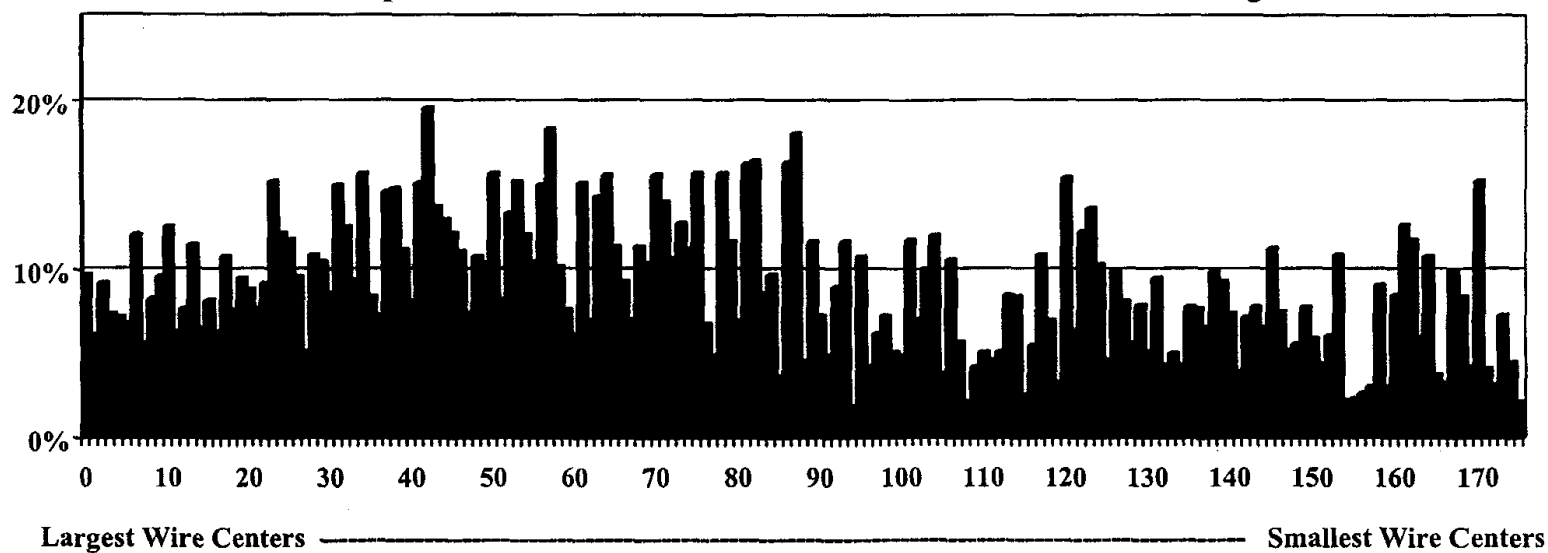


Competitive Profile of UNE-L – BellSouth in Georgia (Statewide)

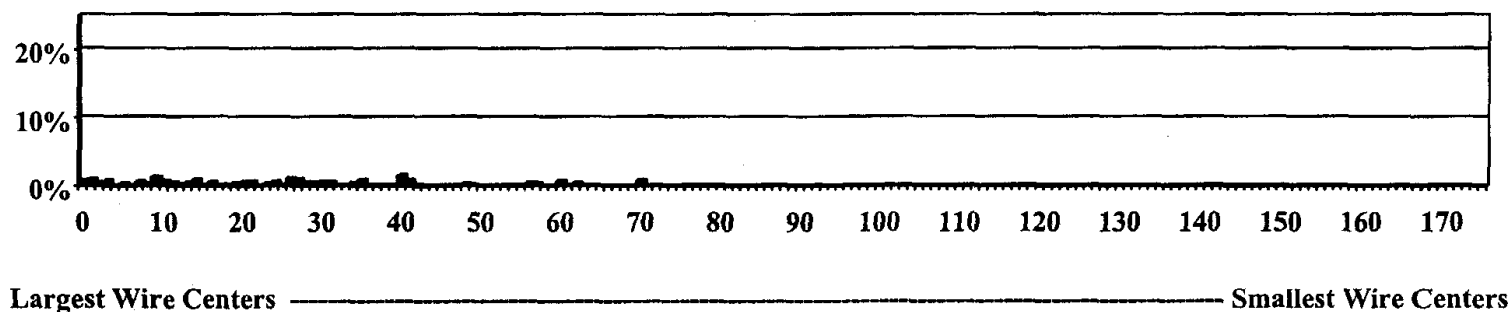


Page 4 of 22
Filed in Georgia Docket 17749-U as Exhibit JPG-3
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P Past 6 Months – BellSouth in Georgia

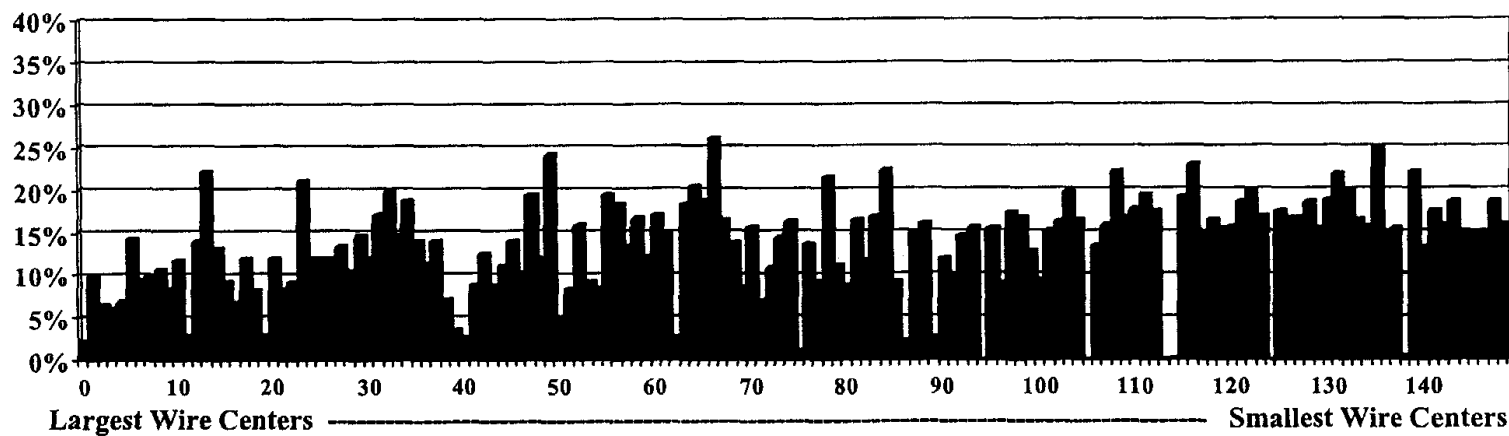


Competitive Profile of UNE-L Past 6 Months – BellSouth in Georgia (Statewide)

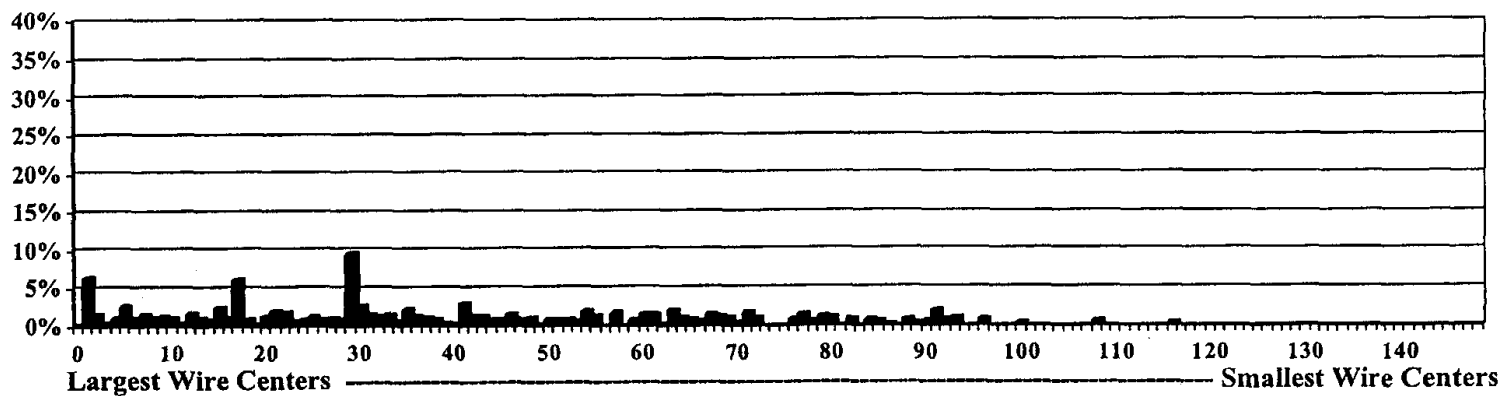


Filed in Illinois Docket No. 03-0595 as CLEC Coalition Exhibit JPG 1.5 (Gillan)
Comparing UNE-P to UNE-L Trigger Candidates

Competitive Profile of UNE-P Based Competition in Chicago MSA

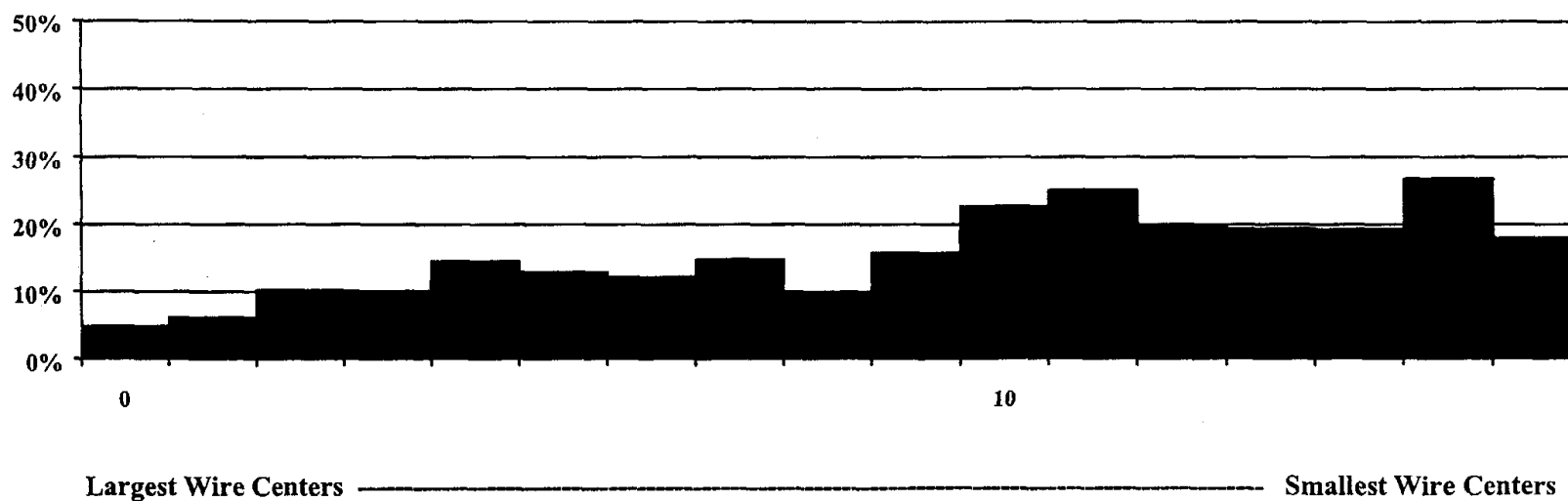


Competitive Profile of UNE-L Trigger Candidates in Chicago MSA

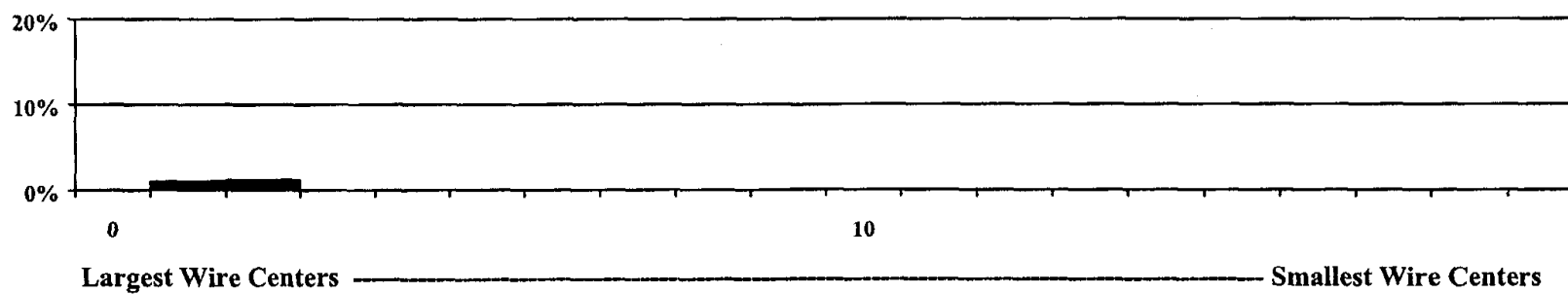


Page 6 of 22
Filed in Indiana Cause No. 42500 as Exhibit JPG-11
Comparing UNE-P to UNE-L – Evansville LATA

Competitive Profile of UNE-P – Evansville LATA

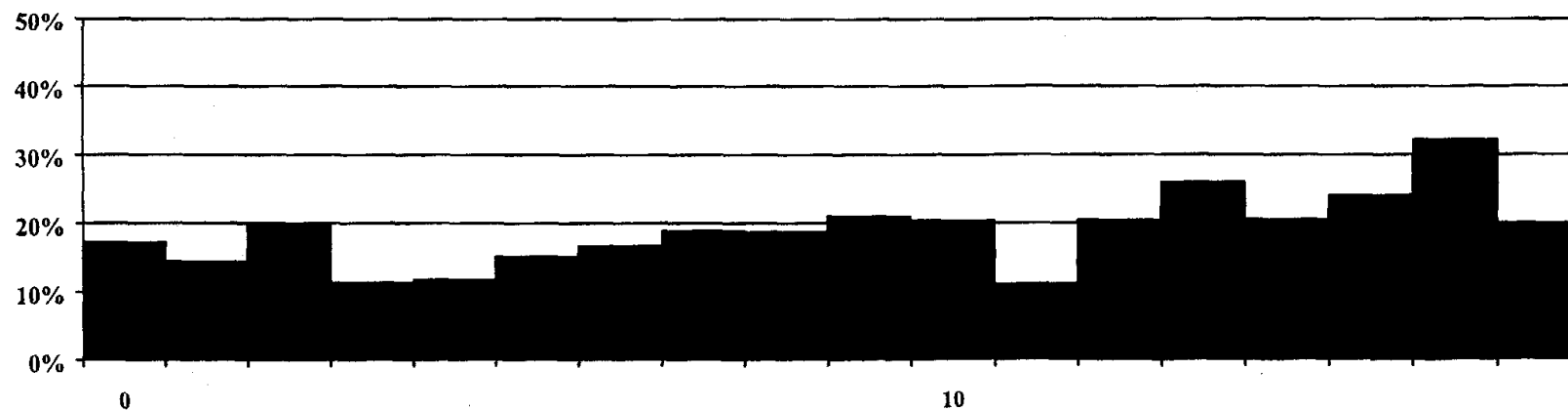


Competitive Profile of Mass Market UNE-L – Evansville LATA



Page 7 of 22
Filed in Indiana Cause No. 42500 as Exhibit JPG-8
Comparing UNE-P to UNE-L – Chicago LATA

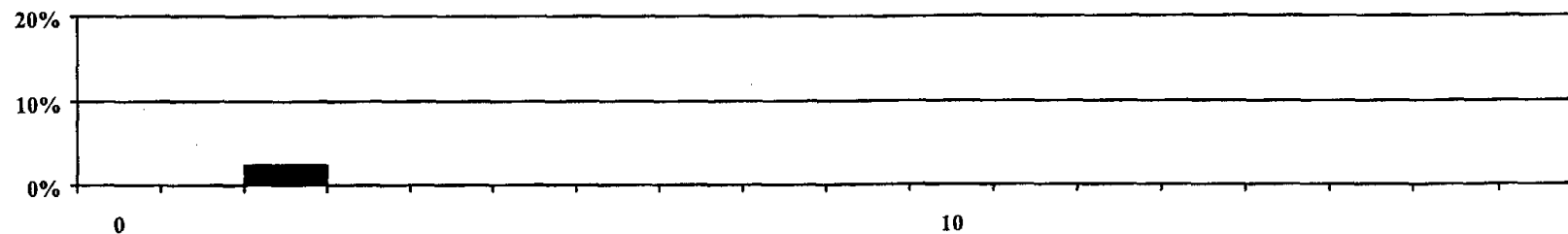
Competitive Profile of UNE-P – Chicago LATA



Largest Wire Centers

Smallest Wire Centers

Competitive Profile of Mass Market UNE-L – Chicago LATA

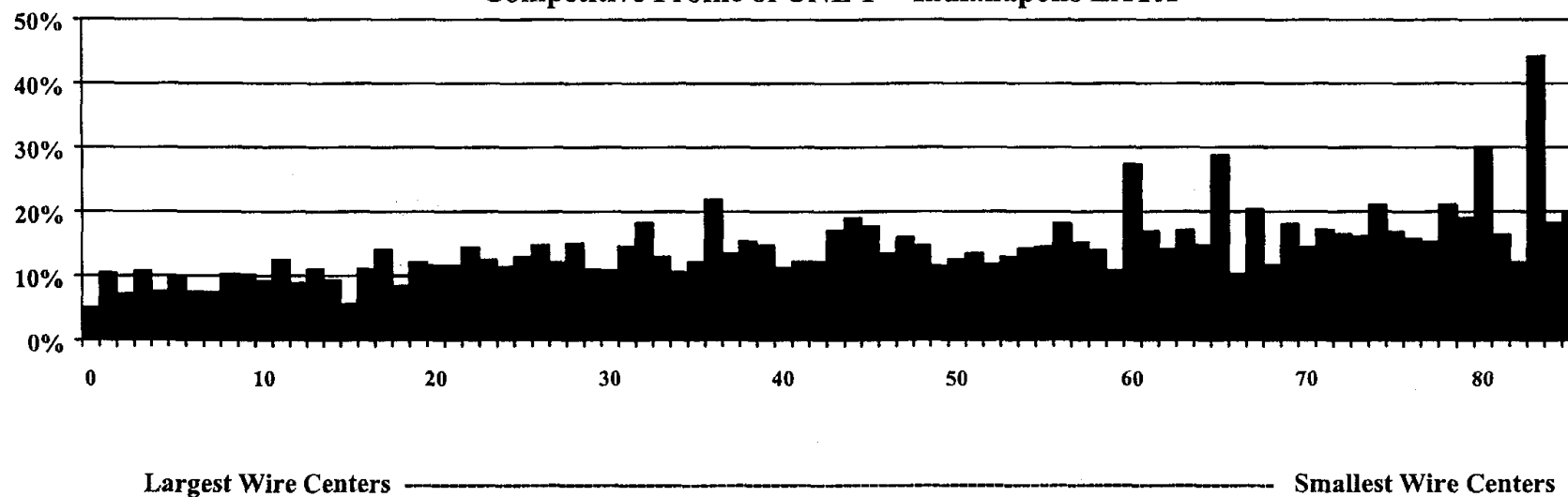


Largest Wire Centers

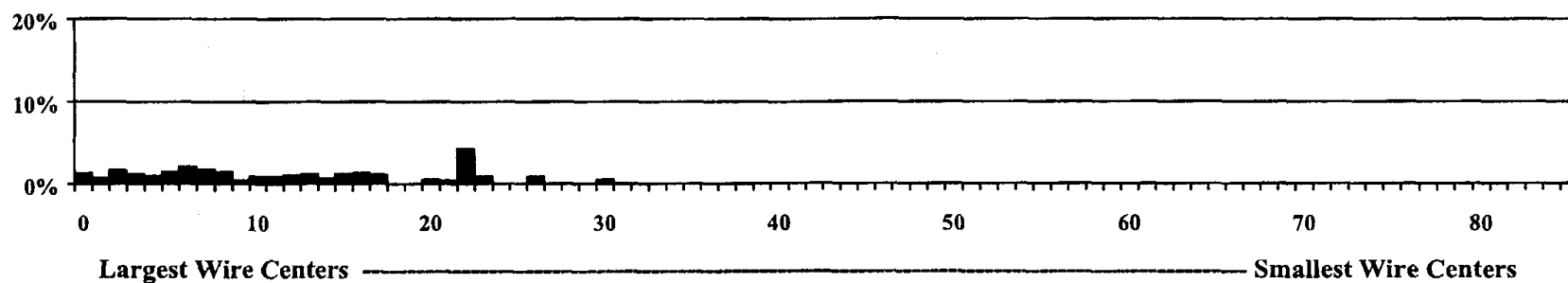
Smallest Wire Centers

Page 8 of 22
Filed in Indiana Cause No. 42500 as Exhibit JPG-10
Comparing UNE-P to UNE-L – Indianapolis LATA

Competitive Profile of UNE-P – Indianapolis LATA

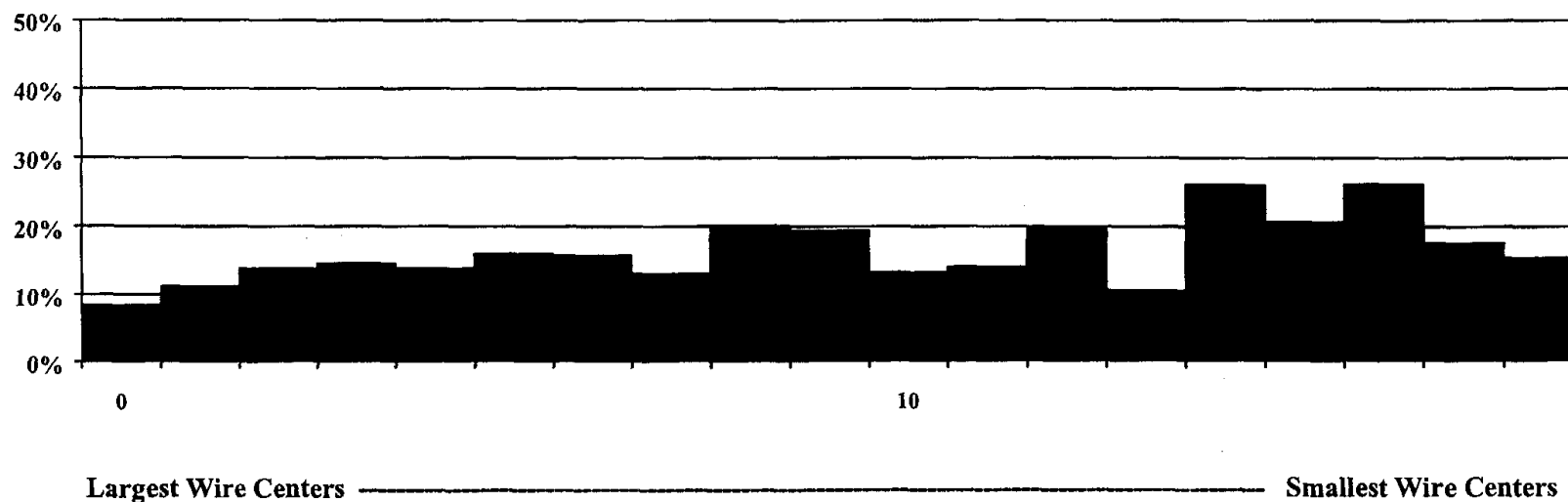


Competitive Profile of Mass Market UNE-L – Indianapolis LATA

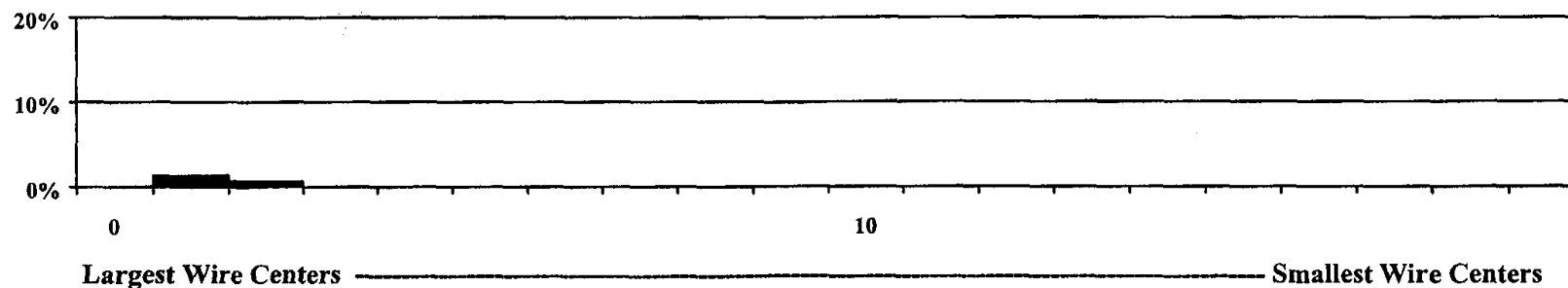


Page 9 of 22
Filed in Indiana Cause No. 42500 as Exhibit JPG-9
Comparing UNE-P to UNE-L – Indianapolis LATA

Competitive Profile of UNE-P – Bloomington LATA

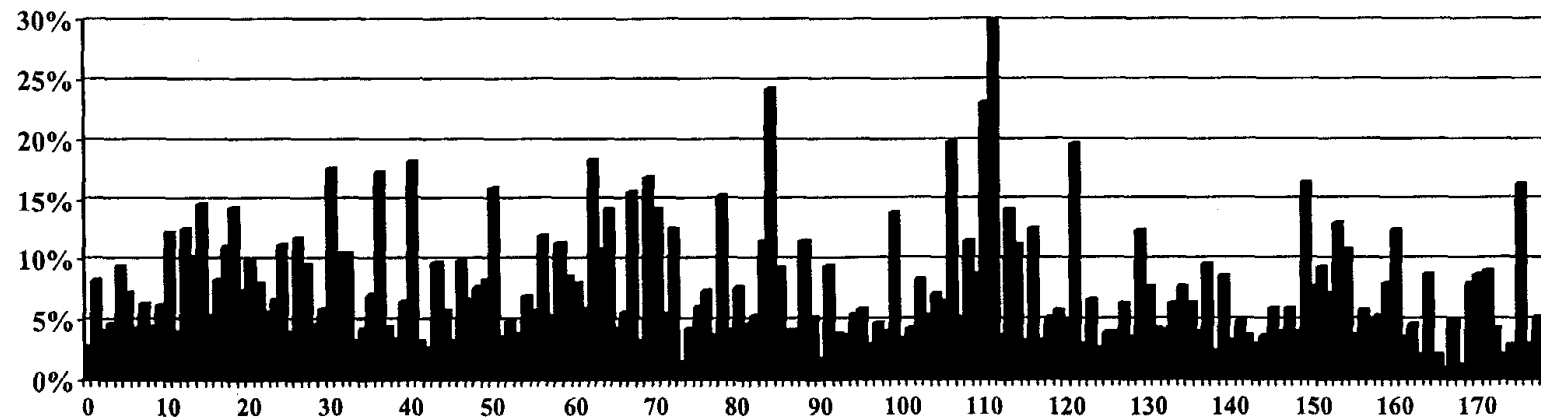


Competitive Profile of Mass Market UNE-L – Bloomington LATA



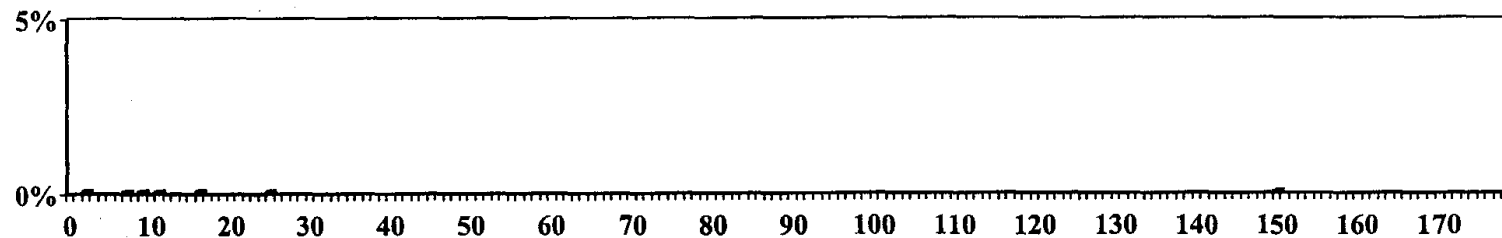
Page 10 of 22
Filed in Kentucky Case No. 2003-00379 as Exhibit JPG-4
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P Past 6 Months – BellSouth in Kentucky
Lines Added April 2003 through September 2003



Largest Wire Centers ————— Smallest Wire Centers

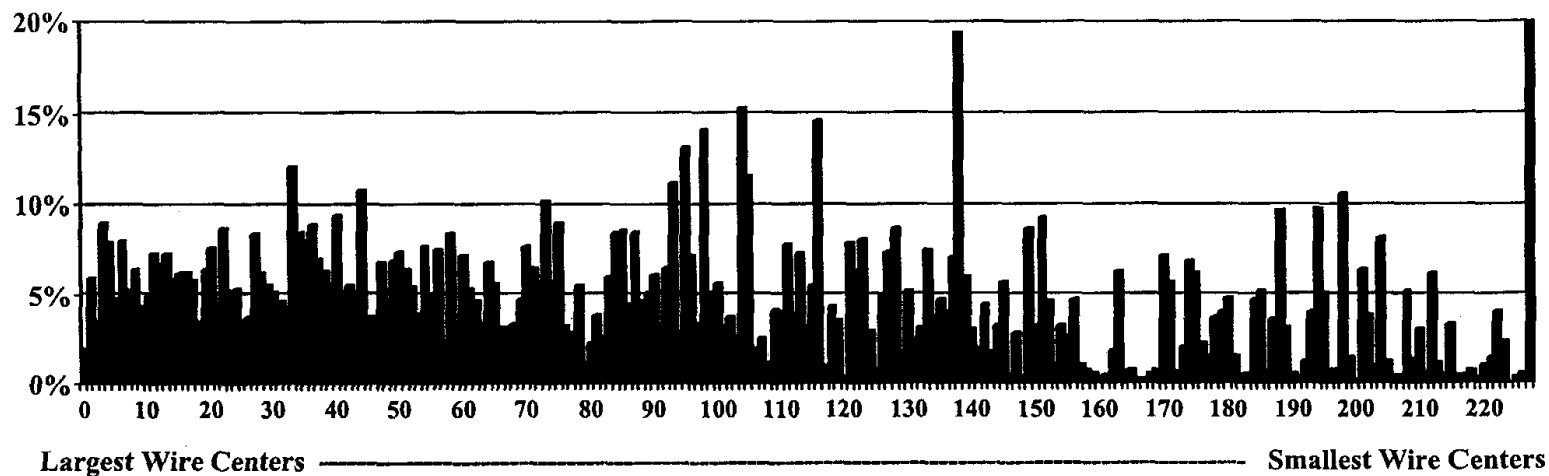
Competitive Profile of UNE-L Past 6 Months – BellSouth in Kentucky



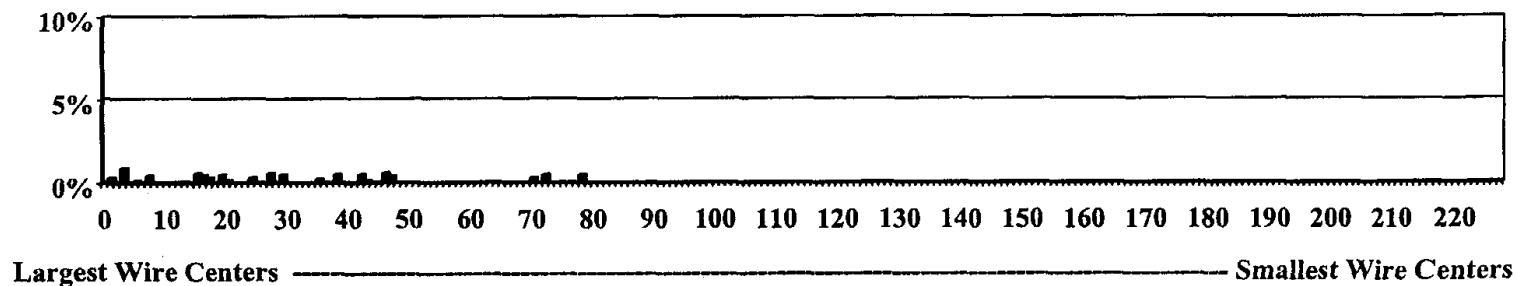
Largest Wire Centers ————— Smallest Wire Centers

Page 11 of 22
Filed in Louisiana Docket No. U-27571 as Exhibit JPG-3
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P Past 6 Months – BellSouth in Louisiana
Lines Added April 2003 through September 2003

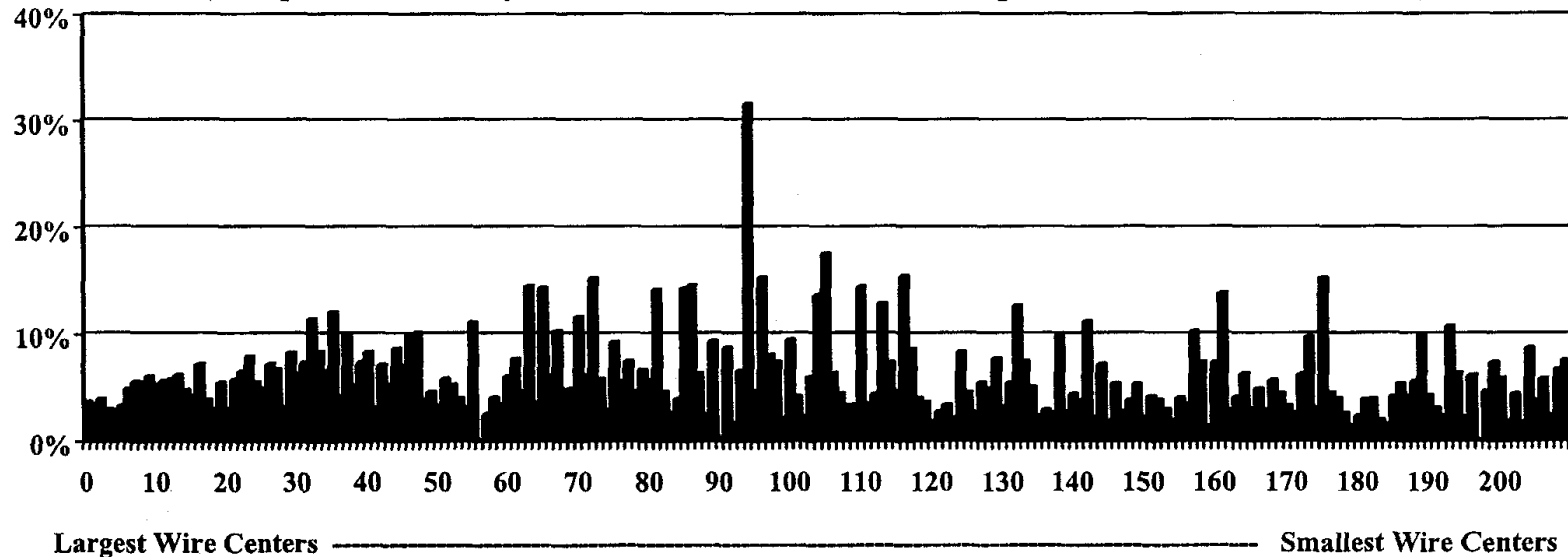


Competitive Profile of UNE-L Past 6 Months – BellSouth in Louisiana

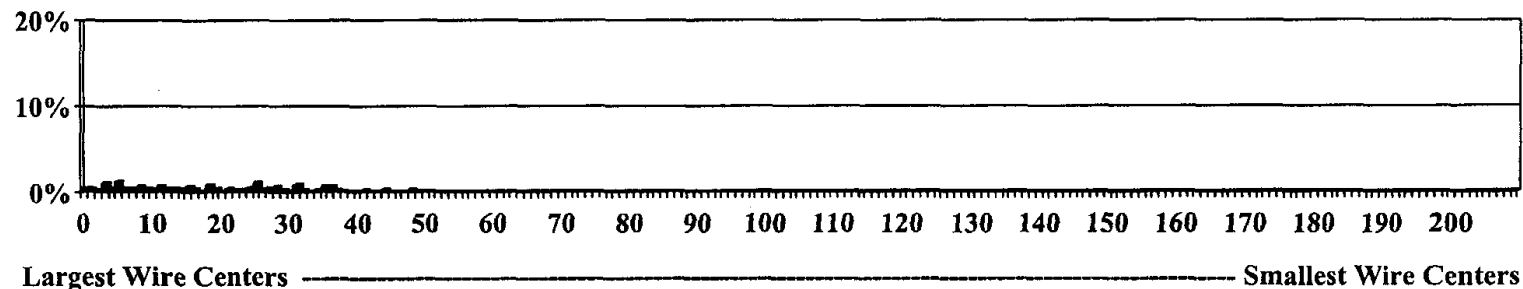


Page 12 of 22
Filed in Missouri Docket TO-2004-0207 as Exhibit JPG-3
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P – SBC Territory in Missouri
(Competitive Share by Wire Center – Ranked from Largest Wire Centers to Smallest)

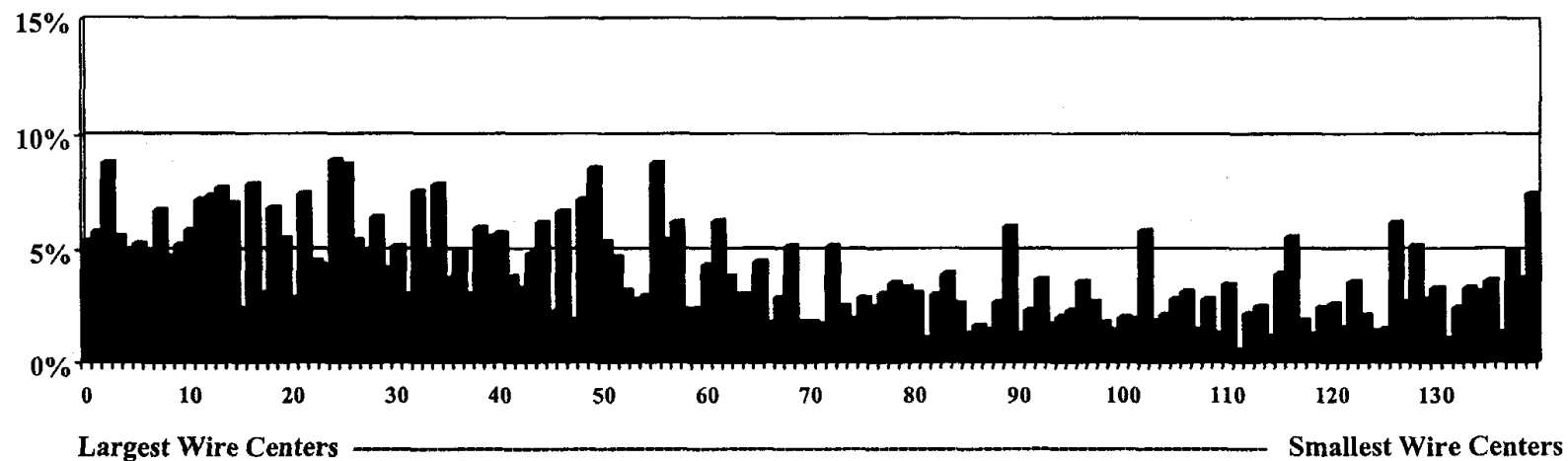


Competitive Profile of Mass Market UNE-L – SBC Territory in Missouri (Statewide)

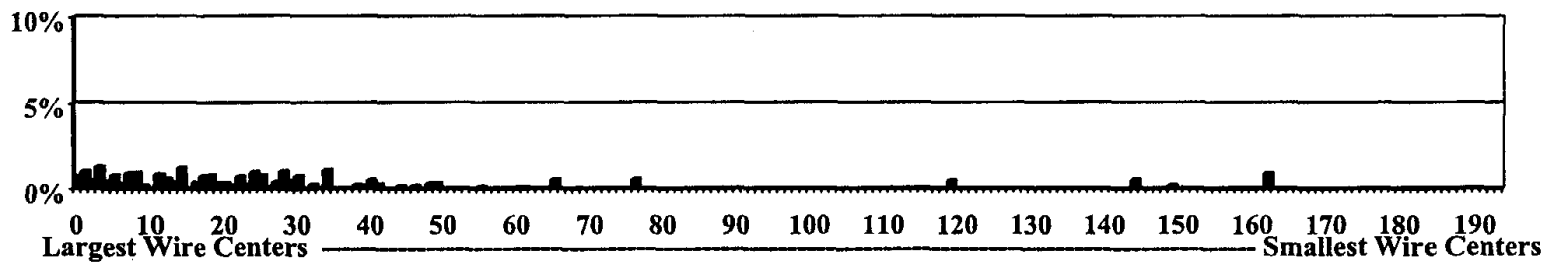


Page 13 of 22
Filed in North Carolina Docket P-100 Sub 133q as Exhibit JPG-4
Comparing UNE-P to UNE-L

**Competitive Profile of UNE-P – BellSouth Territory in North Carolina – Last 6 Months
April to September 2003**

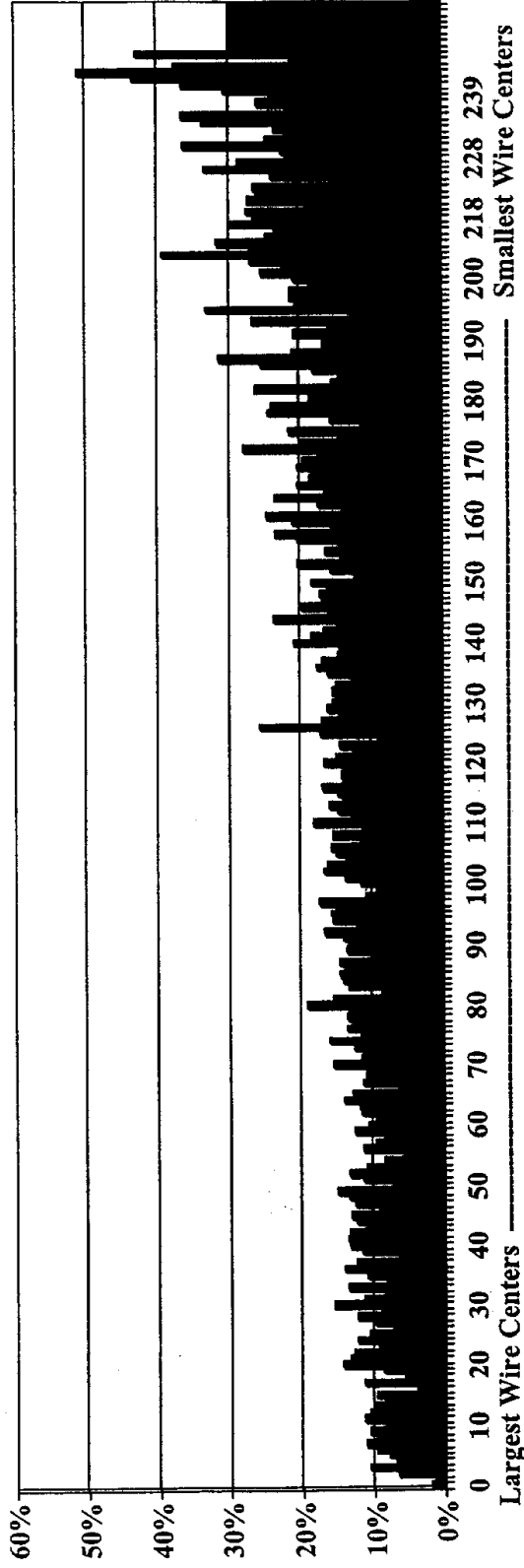


Competitive Profile of UNE-L – BellSouth Territory in North Carolina – Last 6 Months

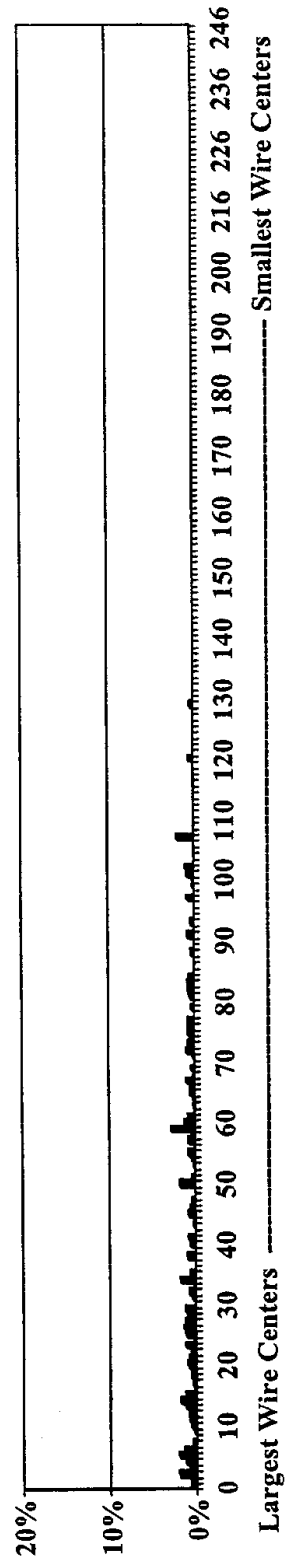


Page 14 of 22
Filed in Ohio Case No. 03-2040-TP-COI as Exhibit JPG-2
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P – SBC Territory in Ohio

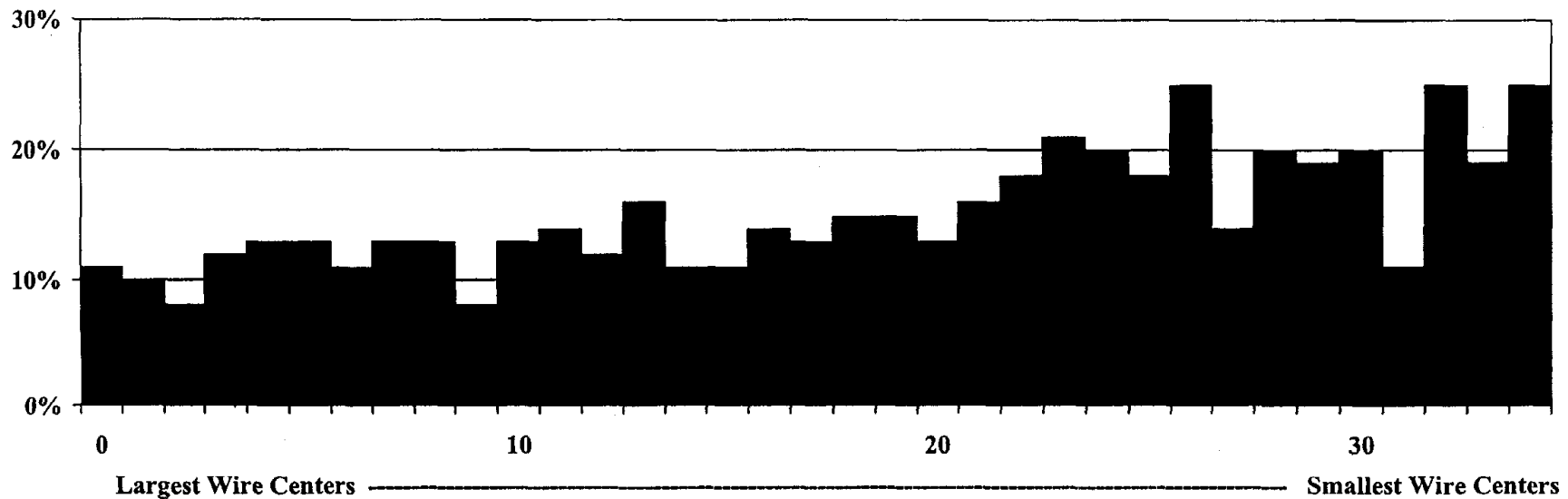


Competitive Profile of Mass Market UNE-L – SBC Territory in Ohio (Statewide)

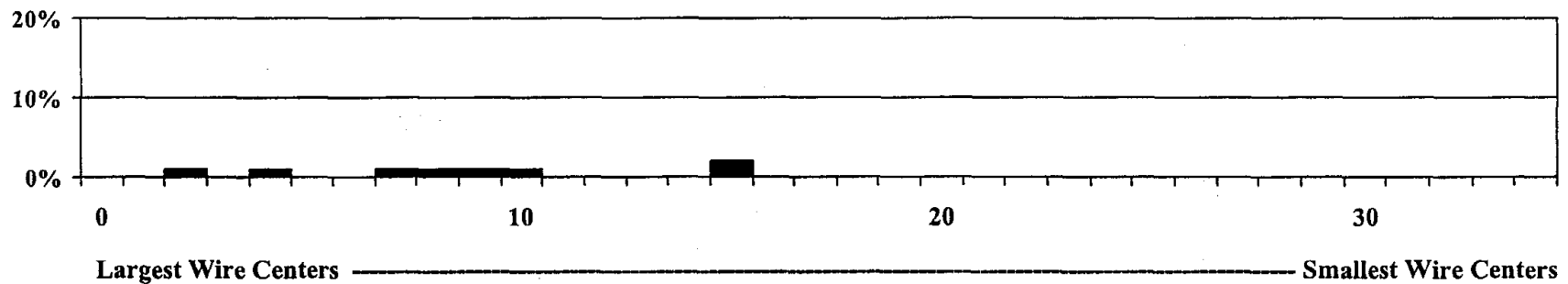


Page 15 of 22
Filed in Ohio Case No. 03-2040-TP-COI as Exhibit JPG-3
Comparing UNE-P to UNE-L – Akron LATA

Competitive Profile of UNE-P – SBC Akron LATA

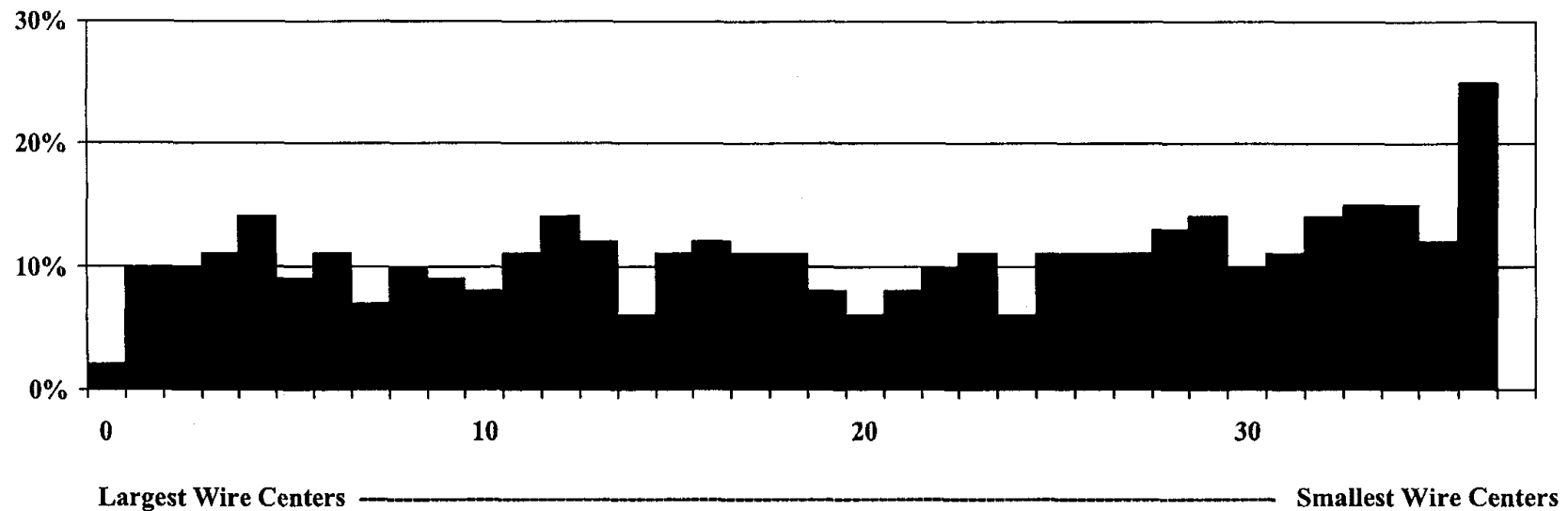


Competitive Profile of Mass Market UNE-L – SBC Akron LATA

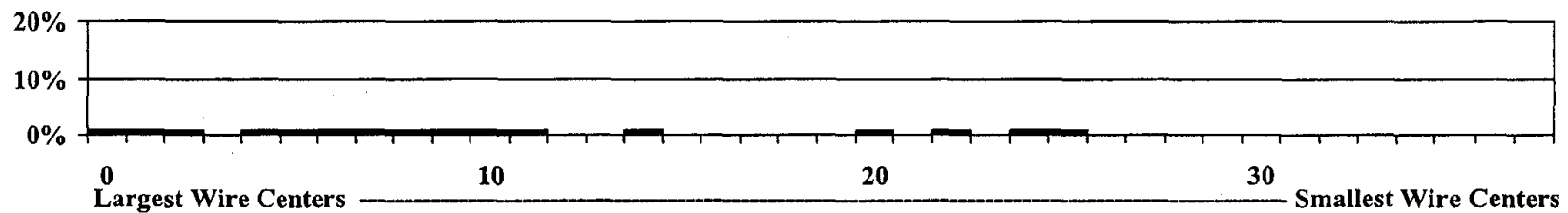


Page 16 of 22
Filed in Ohio Case No. 03-2040-TP-COI as Exhibit JPG-4
Comparing UNE-P to UNE-L – Cleveland LATA

Competitive Profile of UNE-P – SBC Cleveland LATA

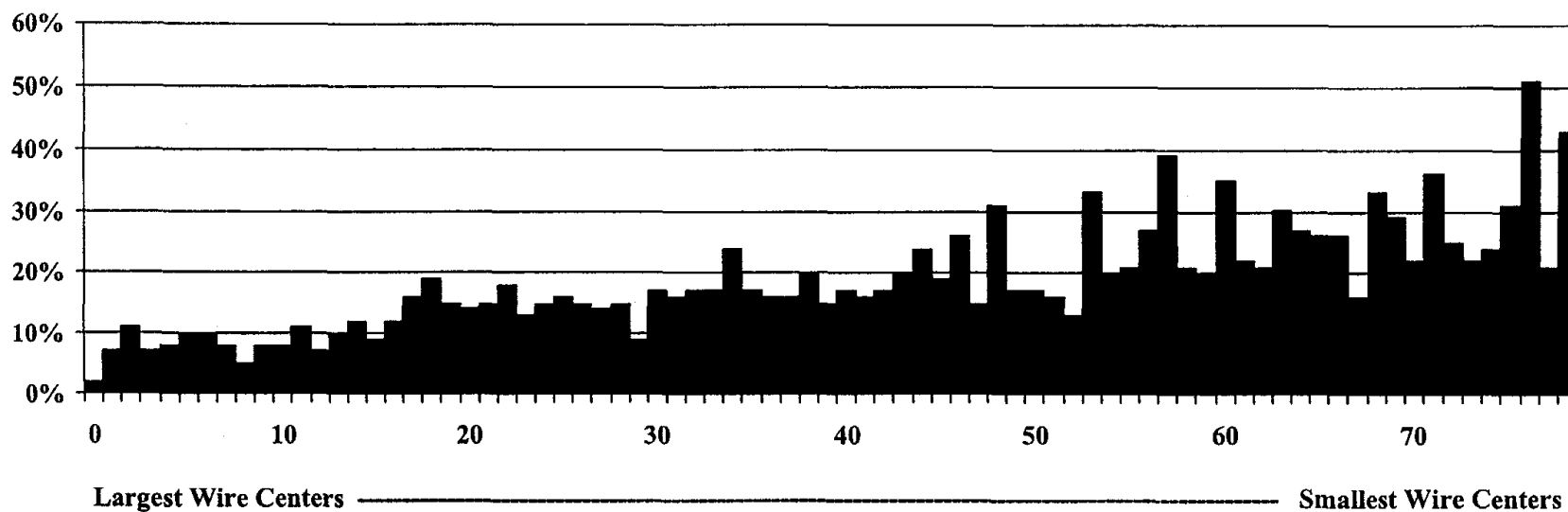


Competitive Profile of Mass Market UNE-L – SBC Cleveland LATA

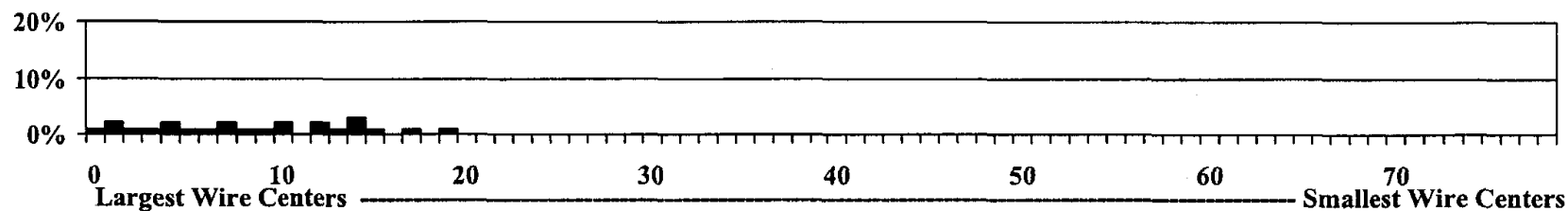


Page 17 of 22
Filed in Ohio Case No. 03-2040-TP-COI as Exhibit JPG-5
Comparing UNE-P to UNE-L – Columbus LATA

Competitive Profile of UNE-P – SBC Columbus LATA

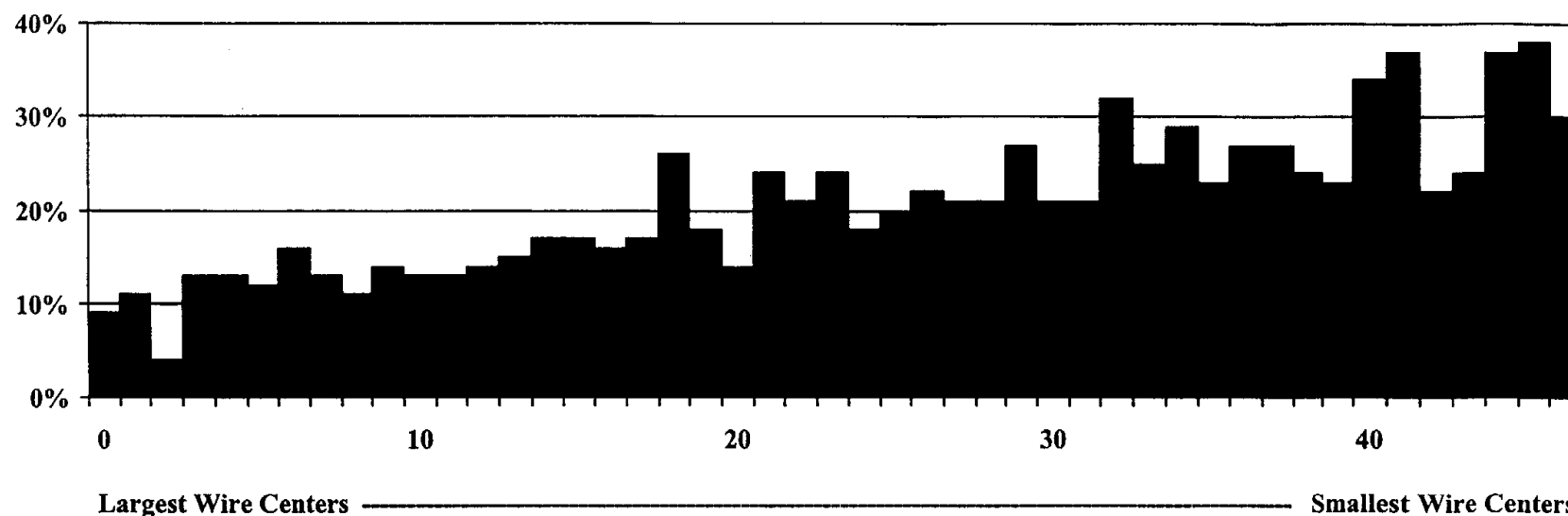


Competitive Profile of Mass Market UNE-L – SBC Columbus LATA

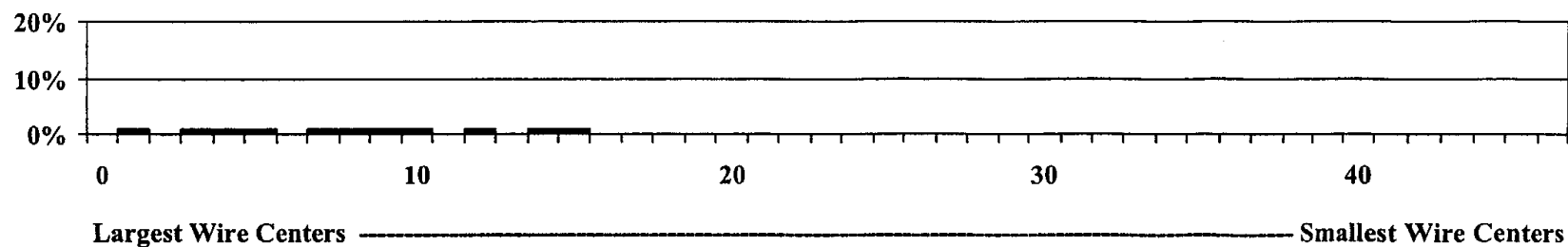


Page 18 of 22
Filed in Ohio Case No. 03-2040-TP-COI as Exhibit JPG-6
Comparing UNE-P to UNE-L – Dayton LATA

Competitive Profile of UNE-P – SBC Dayton LATA

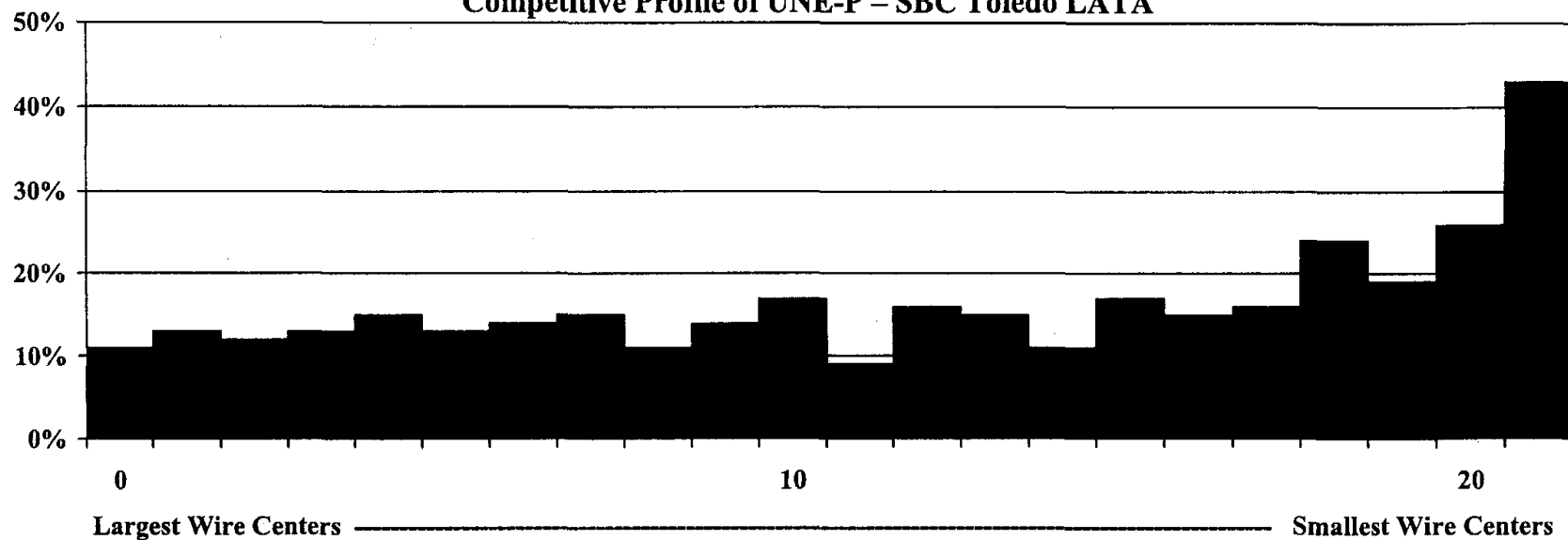


Competitive Profile of Mass Market UNE-L – SBC Dayton LATA

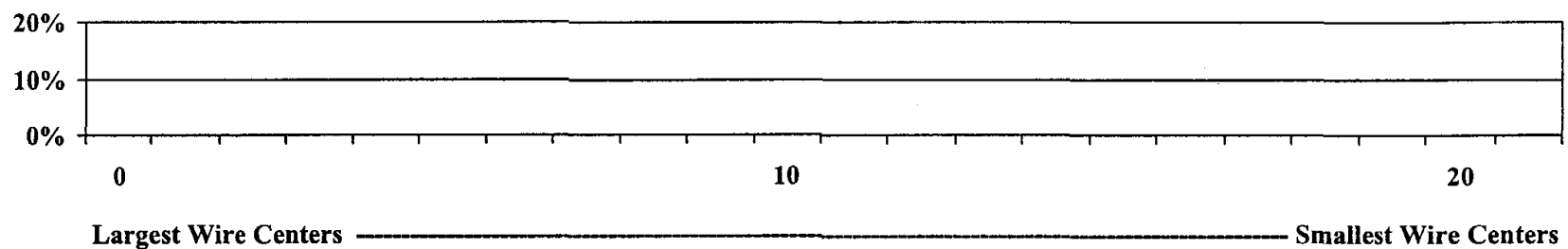


Page 19 of 22
Filed in Ohio Case No. 03-2040-TP-COI as Exhibit JPG-7
Comparing UNE-P to UNE-L – Toledo LATA

Competitive Profile of UNE-P – SBC Toledo LATA

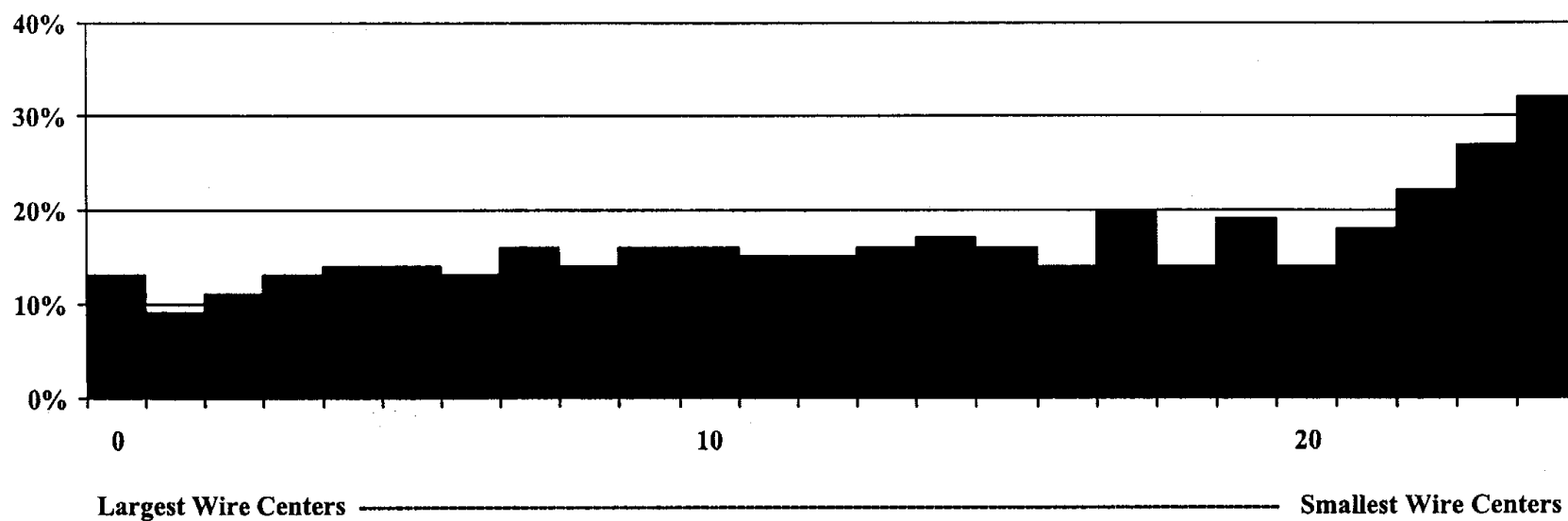


Competitive Profile of Mass Market UNE-L – SBC Toledo LATA

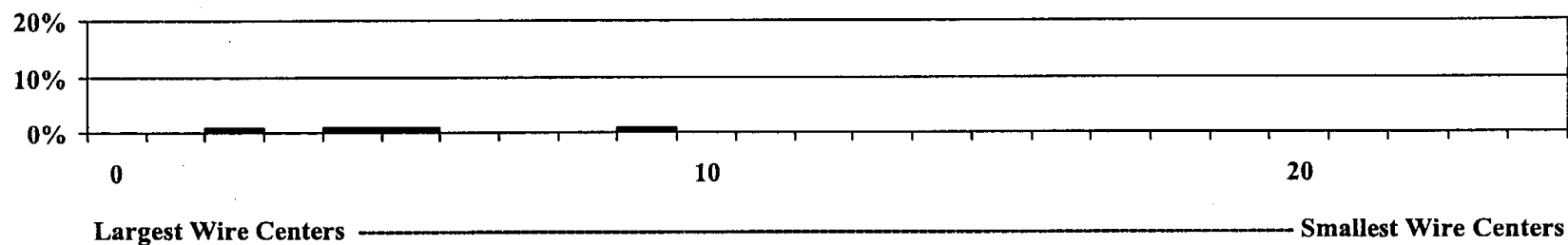


Page 20 of 22
Filed in Ohio Case No. 03-2040-TP-COI as Exhibit JPG-8
Comparing UNE-P to UNE-L – Youngstown LATA

Competitive Profile of UNE-P – SBC Youngstown LATA

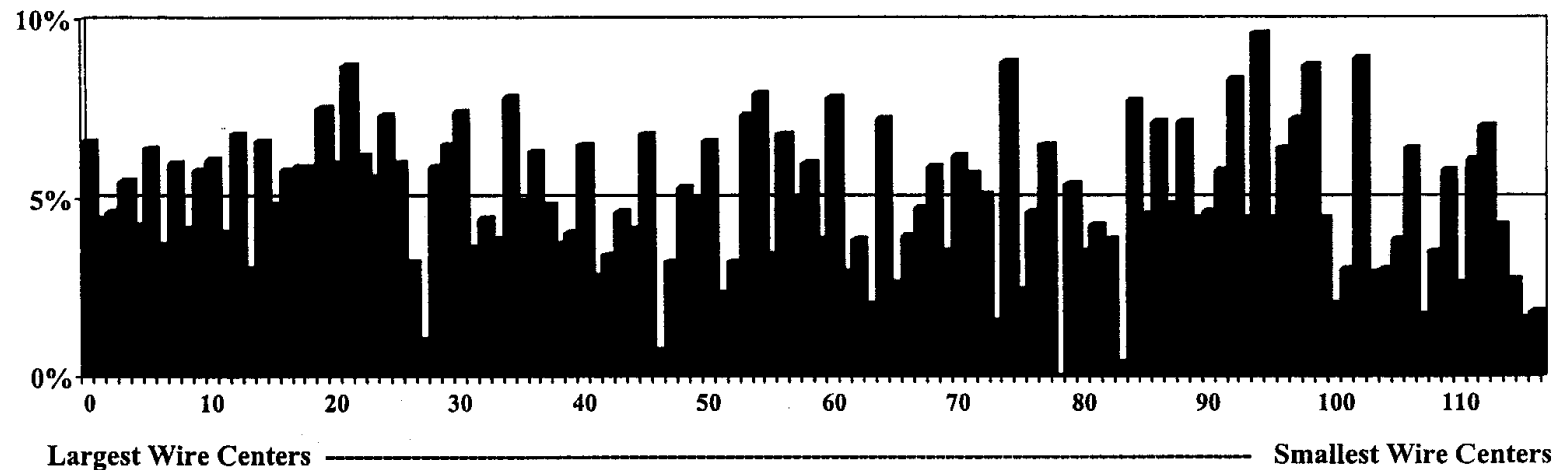


Competitive Profile of Mass Market UNE-L – SBC Youngstown LATA

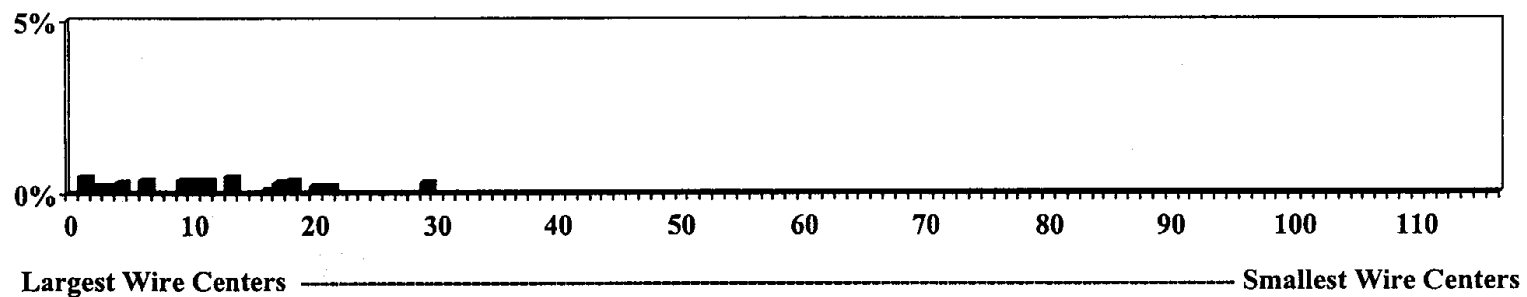


Page 21 of 22
Filed in South Carolina Docket No. 2003-326-C as Exhibit JPG-4
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P Past 6 Months – BellSouth in South Carolina
Lines Added April 2003 through September 2003

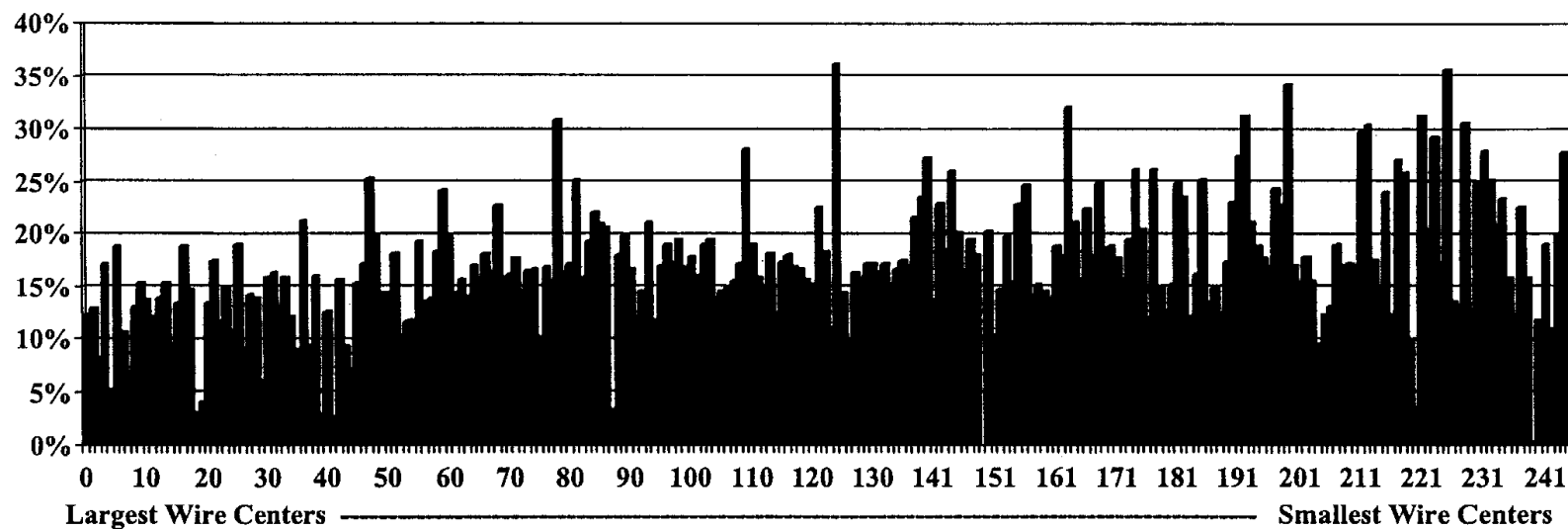


Competitive Profile of UNE-L Past 6 Months – BellSouth in South Carolina



Page 22 of 22
Filed in Texas Docket No. 28607 as Exhibit JPG 2.7
Comparing UNE-P to UNE-L

Competitive Profile of UNE-P in Texas MSAs where SBC Claims Triggers are Satisfied



Competitive Profile of MM UNE-L in Texas MSAs where SBC Claims Triggers are Satisfied

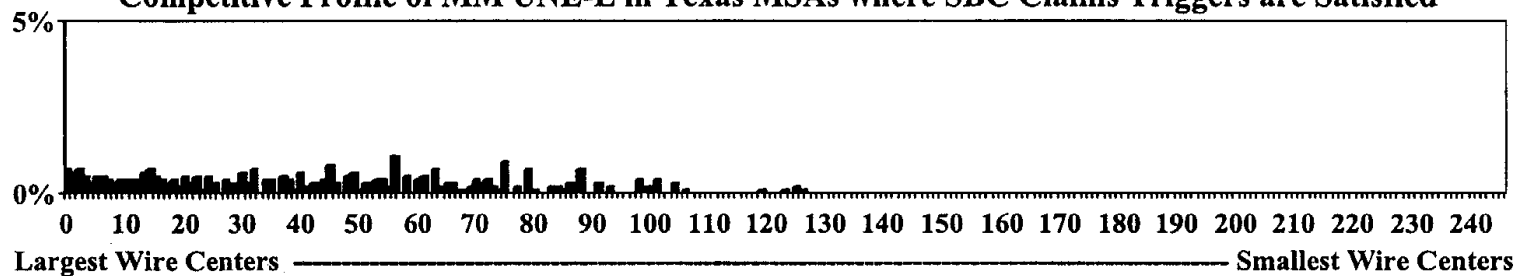


EXHIBIT 22

VERIZON PENNSYLVANIA INC.
STATEMENT NO. 1.0

INVESTIGATION INTO THE
OBLIGATION OF INCUMBENT LOCAL
EXCHANGE CARRIERS TO UNBUNDLE
NETWORK ELEMENTS

DOCKET NO. I-00030099

VERIZON PENNSYLVANIA INC.

STATEMENT NO. 1.0
(DIRECT TESTIMONY)

WITNESSES: Debra M. Berry
Carlo Michael Peduto, II

DATED: October 31, 2003